

## Waite, Justin

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**From:** Chu Rebecca  
**Sent:** Wednesday, November 26, 2014 9:17 AM  
**To:** Waite, Justin  
**Subject:** LDJNR 4.4.2

Rebecca Chu | Remedial Project Manager  
United States Environmental Protection Agency  
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1200 Sixth Ave Suite 900  
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Seattle, WA 98101  
(206) 553-1774  
[chu.rebecca@epa.gov](mailto:chu.rebecca@epa.gov)

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**From:** Chu Rebecca  
**Sent:** Thursday, September 04, 2014 2:29 PM  
**To:** 'Amy E. Desai'  
**Cc:** Ryan Barth; 'Mike Roberts'; Kyle King  
**Subject:** FW: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

FYI

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**From:** Erickson, Ofelia  
**Sent:** Thursday, September 04, 2014 10:30 AM  
**To:** Chu Rebecca  
**Subject:** RE: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Hi Becky,

The three facilities listed below are still acceptable. This VCA is valid for 60 days.

Thanks,

Ofie

Ofelia Erickson  
Environmental Protection Specialist  
Office of Air Waste and Toxic  
1200 6th Ave, Suite 900, M/S AWT-122  
Seattle, WA 98101-3140  
Phone: 206-553-2583

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**From:** Chu Rebecca  
**Sent:** Wednesday, September 03, 2014 12:04 PM  
**To:** Erickson, Ofelia  
**Subject:** RE: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Ofelia-

Has the status changed on this facility since you provided you approval?

Thanks

Becky

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**From:** Erickson, Ofelia  
**Sent:** Tuesday, May 20, 2014 2:27 PM  
**To:** Chu Rebecca  
**Subject:** RE: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Dear Becky,

This email is to confirm that the following facility are acceptable to receive CERCLA waste under the off-site rule (OSR):

Columbia Ridge Landfill  
18177 Cedar Springs Ln  
Arlington OR 97812  
RCRA EPA ID # ORD987173457

Chemical Waste Management of the NW  
17629 Cedar Springs Lane  
Arlington, OR 97812  
RCRA EPA ID # ORD089452353

Greater Wenatchee Regional Landfill and Recycling Center  
191 South Webb Road, Douglas County  
East Wenatchee, WA 98802  
RCRA EPA ID #: None

The OSR acceptability status is dynamic in nature and subject to change. Region 10 has instituted a standard operating procedure where we conduct a verification of continued acceptability (VCA) on facilities that have been previously found acceptable under the OSR. The purpose of a VCA is to provide a periodic check to assure that the facility continues to be acceptable. VCAs are conducted when a request for OSR status is received and the previous VCA had been conducted more than 60 days prior. A VCA is valid for 60 days.

Since your anticipated shipment is sometime in July-September 2014 and may be passed the 60 day period, please check back with me for VCA. Simply return this email at least three to two weeks prior to your first shipment.

Let me know if you have any further questions.

Ofie

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**From:** Chu Rebecca  
**Sent:** Tuesday, May 06, 2014 3:54 PM  
**To:** Erickson, Ofelia  
**Cc:** Schanilec, Kevin  
**Subject:** RE: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Ofie

That is a very good question. I would treat all material at this site, whether it is debris or not, as CERCLA waste. Unless the PRP wants to test the debris prior to leaving the site to ensure it is not contaminated. The area surround the site is a MTCA cleanup, while there's a time critical removal action under a separate EPA order as well in the uplands. Given that- seems prudent to consider it all potentially CERCLA waste unless proven otherwise.

Becky

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**From:** Erickson, Ofelia  
**Sent:** Tuesday, May 06, 2014 3:51 PM  
**To:** Chu Rebecca  
**Cc:** Schanilec, Kevin  
**Subject:** FW: CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Hi Becky,

I have a few questions for you before I start the research.

Number 4 states, "the site from which the waste is to be sent." Do you mean where the waste is coming from?

For the waste that is going to [Greater Wenatchee Regional Landfill](#), it says [waste exceeding 50 % debris](#). Does it meet the definition of CERCLA waste – meaning it has hazardous substance, pollutant or contaminant?

Please let me know.

Thanks,

Ofie

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**From:** Chu Rebecca

**Sent:** Tuesday, May 06, 2014 9:14 AM

**To:** Erickson, Ofelia; Schanilec, Kevin

**Subject:** CERCLA Off-Site Rule, Facility Status – Jorgensen Forge Early Action Area

Ofelia and Kevin

My site is going to be dredging this summer on the LDW. This is the information that the contractor provided about the facilities where the waste will be deposited. I asked them to reach out to Ofelia directly, but I don't see anything in the Work Plan that indicates that happened. So I am following up as well for the purposes of the Off-Site Rule. Here's the details: my site, the Jorgensen Forge Early Action Area, is adjacent to Boeing Plant 2 (RCRA Corrective Action). The CERCLA Removal Action is specific to the sediments in the LDW and bank in front of the Jorgensen Forge facility. The materials will be removed from the site and disposed of as follows:

**1. the name of the facility or facilities to which the waste may be sent:**

Columbia Ridge Landfill and Recycling Center

**2. its EPA ID number(s) or other unique identifying number(s):** DEQ Permit No. 391

**3. the city and state in which each potential receiving facility is located:**  
18117 Cedar Spring Lane, Arlington, OR 97812; T2N, R21E, S32/33 WM

**4. the site from which the waste is to be sent:**

Jorgensen Forge Facility, E. Marginal Way, Seattle, WA,

to the transloading facility, Pacific Pile and Marine Main Yard, 700 S Riverside Drive, Seattle, WA

and then hauled to Alaska Reload and Recycling (Waste Management), 70 S Alaska Street, Seattle, WA 98134 for loading on to gondola cars at the landfill and sued for daily cover or beneficial reuse.

- 5. the type of waste or wastes to be shipped:** contaminated sediments (Subtitle D Materials)
- 6. the amount for each waste to be sent, and:** around 15,000 cubic yards
- 7. when the waste is to be shipped:** July-September 2014

**1. the name of the facility or facilities to which the waste may be sent:**

Chemical Waste Management of the Northwest, Inc

- 2. its EPA ID number(s) or other unique identifying number(s):** DEQ Permit No: ORD 089 452 353
- 3. the city and state in which each potential receiving facility is located:** 17629 Cedar Springs Lane, Arlington, OR 97812
- 4. the site from which the waste is to be sent:**

Jorgensen Forge Facility, E. Marginal Way, Seattle, WA,

to Alaska Reload and Recycling (Waste Management), 70 S Alaska Street, Seattle, WA 98134,

where it will be reloaded on to railcars for transport to Chem NW facility for stabilization and disposal.

- 5. the type of waste or wastes to be shipped:** contaminated sediments (Schedule A TSCA sediments)
- 6. the amount for each waste to be sent, and:** around 500 yards
- 7. when the waste is to be shipped:** July-September 2014

**1. the name of the facility or facilities to which the waste may be sent:**

Greater Wenatchee Regional Landfill and Recycling Center

- 2. its EPA ID number(s) or other unique identifying number(s):** DEQ Permit No. 391
- 3. the city and state in which each potential receiving facility is located:** 191 South Webb Road, Douglas County, East Wenatchee, WA 98802
- 4. the site from which the waste is to be sent:**

Jorgensen Forge Facility, E. Marginal Way, Seattle, WA

via (1) transloading facility, Pacific Pile and Marine Main Yard, 700 S Riverside Drive, Seattle, WA

and then (2) Alaska Reload and Recycling (Waste Management), 70 S Alaska Street, Seattle, WA 98134.

- 5. the type of waste or wastes to be shipped:** waste exceeding 50 % debris
- 6. the amount for each waste to be sent, and:** TBD- limited to waste exceeding 50% debris.
- 7. when the waste is to be shipped:** July-September 2014

Let me know if you have any additional questions/

Becky

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